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District of Nevada
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5 *Counsel for the United States*

6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

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9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 ANGEL GARCIA FLORES,

13 Defendant.

Case No.: 2:18-mj-00126-CWH

Stipulation to Continue Preliminary
Hearing Date (Ninth Request)

14 IT IS HEREBY STIPULATED AND AGREED, by and between DAYLE
15 ELIESON, United States Attorney, BRANDON C. JAROCK, Assistant United
16 States Attorney, counsel for the United States of America and JESS MARCHESE,
17 Esq., counsel for the defendant ANGEL GARCIA FLORES:

18 THAT THE PRELIMINARY HEARING CURRENTLY SCHEDULED
19 FOR November 30, 2018, at 4:00 p.m., before Magistrate Judge Carl W. Hoffman, be
20 vacated and set to a time convenient for the Court, but no later than 30 days from
21 the current setting.
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1 This Stipulation is entered into for the following reasons:

2 1. The Government and the defendant have entered into a plea agreement
3 that has been filed with the District Court in the matter of *United States v. Angel*
4 *Garcia Flores*, 2:18-cr-00315-JCM-CWH (*Sealed*). Due to a conflict in the District
5 Court's calendar, the change of plea hearing was reset from November 5, 2018 to
6 December 4, 2018. Therefore, the parties request additional time to allow for the
7 change of plea hearing to occur which would then alleviate the need for a preliminary
8 hearing or indictment.

9 2. Counsel for the defendant and counsel for the government agree to the
10 continuance.

11 3. The defendant is detained and agrees to the continuance.

12 4. Denial of this request for continuance could result in a miscarriage of
13 justice.

14 5. This is the ninth request for a continuance.

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16 Dated this 8th day of November, 2018.

17 Respectfully Submitted,

18 DAYLE ELIESON
19 United States Attorney

20 /s/ Brandon C. Jaroch
21 BRANDON C. JAROCH
Assistant United States Attorney

22 /s/ Jess Marchese
23 JESS MARCHESE, Esq.
Counsel for FLORES

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

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3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 ANGEL GARCIA FLORES,

7 Defendant.
8

Case No.: 2:18-mj-00126-CWH

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS ORDERED that the Preliminary Hearing, currently scheduled for
12 November 30, 2018, at 4:00 p.m., be vacated and continued to December 26, 2018,
13 at 4:00 p.m.

14 DATED this 13 day of November, 2018.

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16 
17 HONORABLE CARL W. HOFFMAN
18 UNITED STATES MAGISTRATE JUDGE
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